

Exhibit 6

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANTHONY RAPP and C.D.,

Plaintiffs,

-against-

KEVIN SPACEY FOWLER a/k/a KEVIN SPACEY,

Defendant.

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)
) Case No.: 20-cv-9586(LAK)
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)
)
)
)

Videotaped/Videoconference Deposition of

CHRISTOPHER DENNY

December 3, 2021

Cila Meyer, CSR No. 4914
478393



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09:17 1 Q Why did you call Mr. Saghir three months ago?

09:17 2 A I called him after, um, an unsettling and
3 surprising incident. Again, I have not been asked to do
4 depositions before, so I don't really know -- I haven't
5 really known how these things work.

09:18 6 Um. While I was in the midst of a rehearsal in
7 my own studio with several other people -- I'm a music
8 director. That's what I do for a living -- um, my
9 doorman buzzed me and said that someone was here from --
10 and he tried to pronounce the name of an organization.
11 And I didn't know what that was.

09:18 12 I said, "Who are they?"

09:18 13 And he said, "Well, they have some papers, and
14 the letterhead says" such-and-such. And I said -- "they
15 want to see you."

09:18 16 And I said, "I have no idea who that is."

09:18 17 I'm a New Yorker, so I don't let anybody up
18 unless I know them. And I said, "I don't know who they
19 are, but, you know, no. I'm not going to have anybody
20 come up right now in the middle of -- of a rehearsal.
21 We're right in the middle of things. So if they need to
22 reach me, they'll reach me another way."

09:19 23 So the person left. And I was unsettled by
24 this, and I really couldn't figure out what it could be
25 about. You can imagine your mind goes to a million

1 things. Why would some law firm be looking for me.

2 Your mind goes to millions of places of, you know, oh,
3 you know, why would someone be looking for me.

09:19 4 And what -- what occurred to me as a
5 possibility was that it could be because I had said I
6 would testify in this case, that it could be -- it
7 wasn't going to be Anthony's attorney, because he would
8 have called me, so I thought perhaps it could be Kevin
9 Spacey's attorney.

09:19 10 So what I did was I had Peter's number. I
11 called Peter and -- because he had called me, so his
12 number was in my phone. So I called him, reintroduced
13 myself, and just said that this had happened. And I
14 said, "Is it possible, do you know whether they're
15 sending people around to the people on the list, you
16 know, of those who will testify?"

09:20 17 And he just said, "I have not heard of that,
18 but it's certainly possible that could be what it was."

09:20 19 I just needed to have some idea for my own
20 peace of mind as to why someone was trying to get up to
21 my apartment in the middle of my workday without my
22 knowing who they were and without introducing themselves
23 in some normal way.

09:20 24 So that was what it was. He just told me,
25 "Yes, that's a possibility." So he said, "If they come

1 back to you, you know, then let me know" or whatever. I
2 don't even think he said that. He just said, "They may
3 come back to you later, but don't worry about it." That
4 was the gist of it.

09:20 5 Q Did Mr. Saghir discuss the substance of the
6 case with you on that second phone call?

09:21 7 A No. He simply responded to my question.

09:21 8 Q Did he say anything else about what you should
9 do if anyone on behalf of Mr. Fowler tries to serve you
10 in the future?

09:21 11 A No. No.

09:21 12 Q Did Mr. Saghir --

09:21 13 A No. I was going to say no. We didn't discuss
14 anything like that. I am not wise enough to know that I
15 have any options. If someone served me, they served me,
16 you know.

09:21 17 Q Did Mr. Saghir tell you that Anthony Rapp
18 listed you as a witness for trial in this case?

09:21 19 A Well, he had asked me for permission to have
20 myself listed as a -- as a witness or a potential
21 witness. And I had said "yes" in the first phone call,
22 so that was a given in my mind. I knew that I had
23 volunteered to do that.

09:21 24 Q And did Mr. Saghir tell you that he disclosed
25 your address as part of the typical process of

1 disclosing a witness for trial?

09:22 2 A No. I don't think we talked about it. Again,
3 I made assumptions. You know, I watch television
4 programs. That's all I know.

09:22 5 Q You don't believe there's anything improper
6 with one side seeking to contact or depose the other
7 side's witness before trial, do you?

09:22 8 A Nothing improper. I naively assumed that
9 someone would contact me in some normal way like email
10 me, or call me, or something and say, "We want" -- "we
11 need to serve you with this." You know, I mean some
12 way. "Will you be home? You know, just -- I'm not used
13 to people trying to sort of barge in and, you know, kind
14 of get me by surprise. So that was what . . .

09:22 15 Q Do you remember anything else about that second
16 phone call?

09:22 17 A No, I don't.

09:22 18 Q You mentioned there was a third phone call.
19 Can you tell me about that?

09:22 20 A Well, that was after the people -- two men
21 showed up, when I was out of the apartment working
22 elsewhere, and they showed up and they were let up by my
23 foster son who was here. They were let upstairs. My
24 doorman buzzed. And my foster son, who was here that
25 day, let them up because they said they were -- it was

1 food delivery. And in fact I was expecting a shipment
2 from, you know, some director later that day. So he
3 mistakenly thought that's who it was. And he said,
4 "Okay. Come on up."

09:23 5 And when he opened the door there were two men
6 videotaping him, who just shoved a platter full of fruit
7 and cheese and stuff and a note supposedly from Michael
8 Feinstein in his hands, and then demanded his ID. And
9 really shook him. He was not prepared and said, "Who
10 are you?"

09:24 11 "We want to see your ID right now," according
12 to him.

09:24 13 And I presume you have videotape of this, so
14 you know exactly what they did and said. But his
15 recounting to me was that they demanded his ID. He
16 didn't give them ID. He didn't know who they were. So
17 he just said, "Who are you?"

09:24 18 And they wouldn't tell him who they were or why
19 they were there, but they shoved that in his hands and
20 shoved two envelopes, you know, in his hands without
21 saying anything about what they were. And eventually
22 one of the men said to the other "he's not the person"
23 or whatever. But the other kept demanding my foster
24 son's ID. And finally they left.

09:24 25 And I got a series of texts from my, you know,

1 foster son just saying, you know, "Call home. Call
2 home."

09:25 3 And I interrupted the rehearsal I was in and
4 called home and was told the story and was obviously
5 very unhappy with the way these people had behaved. Um.
6 So, um, I felt that was worth telling someone, and so I
7 decided to call Peter Saghir simply because I had spoken
8 to him when I had -- apparently I assume then, you know,
9 had someone attempt to come up before, and now they had
10 done it in sort of a sneaky way, and -- and rather upset
11 my foster son.

09:25 12 Um. And so I -- I recounted this to him as I
13 just told you. And I had opened the envelopes and I had
14 received the paper that specified this date and time for
15 a deposition.

09:25 16 Q And you spoke with Mr. Saghir on that third
17 occasion?

09:25 18 A I told him what had happened. And I told him
19 that I was upset about it. And, you know, his advice
20 was simply that, you know, if I didn't want to have
21 people doing this again and again, because they had not
22 served me actually. They simply put these envelopes in
23 the hands of my foster son, he said, "Perhaps, you know,
24 if you want to, you could call Chase Scolnick and you
25 could simply tell" -- "say that you received this, and

1 that you would voluntarily be deposed at this time."
2 Or in my case I was, at the time, thinking I might like
3 to move the day a few days later, but it turned out not
4 to be necessary. So he simply said, "If you want to,
5 you could sort of hopefully prevent future occurrences
6 like that by simply calling and letting them know that
7 you're willing to voluntarily speak to them." And I
8 said I'm going to do that, so I did the next day.

09:27 9 Q Well, I wasn't aware of the details of the
10 interaction with your son, so I apologize if it was
11 inconvenient or distressing for him.

09:27 12 But can you remember anything else about the
13 phone call you had with Mr. Saghir that third time?

09:27 14 A No. I don't really recall anything else, no.

09:27 15 Q You and I spoke last week; correct?

09:27 16 A Was it last week? If you say so. It was a few
17 days ago, yeah.

09:27 18 Q Okay. We had a short call; correct?

09:27 19 A It was Friday maybe. I think it was Friday,
20 yeah. Yes. I had called you more than two weeks
21 earlier, which was when I had had this conversation -- I
22 know I had called you a couple of weeks earlier and
23 spoken to someone at your office. Did not hear back.
24 They said they would get you my message and information.
25 Did not hear from you. So after what I guess was a

1 couple of weeks or so, I called again.

09:28 2 Q I called you last week, returned your call?

09:28 3 A I think that's correct.

09:28 4 Q I was polite and courteous on the phone call
5 with you; correct?

09:28 6 A Absolutely. Yeah.

09:28 7 Q You have no complaints about my interaction
8 with you, right, on the call?

09:28 9 A Not at all, no.

09:28 10 Q When was the last time you spoke with
11 Mr. Saghir?

09:28 12 A Um. Actually, there was a fourth time because
13 it was just -- I'm sorry. I'm just not counting
14 properly. There was a fourth time. I spoke with him,
15 um, I guess it was a couple of nights ago. And he, um,
16 he called me simply to make sure that I was doing this,
17 you know, this date and time; and that I knew that I
18 had -- it was 12 o'clock our time not 9 o'clock; that I
19 had to be ready and, you know -- and that I had -- just
20 to make sure that I knew what time, and that it was on
21 Zoom, and so on and so forth.

09:29 22 You know, I said, "Yes, I know that." And I
23 told him then that I had spoken to you and confirmed I
24 would do it, and so that was that. So, yeah, you're
25 right. There was -- there was that.

DEPOSITION OFFICER'S CERTIFICATE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I, Cila Meyer, hereby certify:

I am a duly qualified Certified Shorthand
Reporter in the State of California, holder of
Certificate Number CSR 4914 issued by the Certified Court
Reporters' Board of California and which is in full
force and effect. (Fed. R. Civ. P. 28(a)(1)).

I am authorized to administer oaths or
affirmations pursuant to California Code of Civil
Procedure, Section 2093(b) and prior to being examined,
the witness was first duly sworn by me. (Fed. R. Civ.
P. 28(a)(a)).

I am not a relative or employee or attorney or
counsel of any of the parties, nor am I a relative or
employee of such attorney or counsel, nor am I
financially interested in this action. (Fed. R. Civ. P.
28).

I am the deposition officer that
stenographically recorded the testimony in the foregoing
deposition and the foregoing transcript is a true record

/ / /

1 of the testimony given by the witness. (Fed. R. Civ. P.
2 30(f)(1)).

3 Before completion of the deposition, review of
4 the transcript [xx] was [] was not requested. If
5 requested, any changes made by the deponent (and
6 provided to the reporter) during the period allowed, are
7 appended hereto. (Fed. R. Civ. P. 30(e)).

8
9 Dated: December 20, 2021

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